

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

Universitas Education, LLC (judgment creditor))
Plaintiff,)
v.) Case No. _____
Nova Group, Inc., as Trustee, Sponsor and fiduciary of the Charter Oak Trust (judgment debtor)) (U.S.D.C., S.D.N.Y. Case No. 11-1509-LTS HBP)
Defendants.)

AFFIDAVIT OF DAN CARPENTER

STATE OF CONNECTICUT)
) ss.
COUNTY OF HARTFORD)

Daniel E. Carpenter, of legal age, being first duly sworn, upon oath, deposes and states as follows:

1. I am of lawful age, have personal knowledge of and I am competent to testify to the matters set forth in this Affidavit.
2. I am the Chairman of the Managing Member of Avon Capital, LLC, a business entity registered in the State of Wyoming.
3. Avon Capital purchased a number of life insurance policies held by Thomas Moran and Asset Service Group, Inc. (ASG) in the company SDM Holdings, LLC on or about the 15th day of December, 2008.
4. Moran and ASG had purchased the SDM life insurance policies in question in a bankruptcy proceeding.

5. The SDM life insurance policies are the property of SDM Holdings, LLC, which is 100% owned by Avon and not the property of any defendant in the underlying New York litigation.
6. The purchase documents between Avon and Moran and ASG contain sensitive business terms and secrets, which would be damaging to Avon and Moran and ASG, as well as the individual insureds that make up the policies owned by SDM Holdings, were they to be released.

Further affiant sayeth not.



Daniel E. Carpenter
DANIEL E. CARPENTER

Subscribed and sworn before me this 21 day of May, 2013.



Deborah Thomas
Notary Public

My Commission Expires: Nov 30, 2015

My Commission Number: _____

